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9	IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA		
10			
11	UNITED STATES OF AMERICA,	) 3:73-cv-00127-MMD-WGC	
12	Plaintiff,		
13	WALKER RIVER PAIUTE TRIBE,	) STIPULATION AND ORDER FOR ) EXTENSION OF TIME TO SUBMIT	
14	Plaintiff-Intervenor,	) PROPOSAL REGARDING ) DISCOVERY PROCEDURE AND	
15 16	v.	) AGENDA FOR STATUS ) CONFERENCE, AND TO VACATE	
17	WALKER RIVER IRRIGATION DISTRICT,	STATUS CONFERENCE OF DECEMBER 18, 2019	
18	a corporation, et al.,	(First Request)	
19	Defendants.	(First Request)	
20		)	
21	1. Pursuant to the Stipulated Scheduling Order and Discovery Plan (ECF 2437),		
22	the United States and Walker River Paiute Tribe, and the Walker River Irrigation District, the		
23	Nevada Department of Wildlife, Lyon County, Centennial Livestock, Desert Pearl Farms, LLC,		
24	Peri Family Ranch, LLC, Peri & Peri, LLC and Frade Ranches, Inc., The Schroeder Group,		
25	California State Agencies (California State Water Resources Control Board, California		
26	Department of Fish and Wildlife and the California Department of Parks and Recreation), and		
27	Mono County, California (the "Principal Defendants"), and Mineral County and the Walker		
28	Lake Working Group were to submit a proposal to	o the Court on or before December 16, 2019	

concerning, among things, coordination of discovery, including sharing discovery, scheduling discovery, and other matters related to discovery and concerning matters related to dispositive or partially dispositive motions (the "Discovery/Motion Proposal").

- 2. Pursuant to the Minute Order of August 8, 2019 (ECF 2560), the Court scheduled a Status Conference for December 18, 2019 at 10:00 a.m. to, among other things, issue any orders needed to resolve disputes, if any, concerning the Discovery/Motion Proposal among the parties, and to amend the Scheduling Order accordingly, and further directed the United States to prepare an agenda for that Status Conference to be submitted on or before December 13, 2019.
- 3. The United States and Walker River Tribe and the Principal Defendants have exchanged drafts of Discovery/Motion Proposals, and have conferred and met in-person to attempt to resolve the areas of disagreement between them.
- 4. Based upon the parties' exchange of those drafts and their conference, it is clear that the parties have common ground, but also continue to have significant differences between them concerning the content of the Discovery/Motion Proposal.
- 5. In order to attempt to reach an agreement on some or all of those differences, the United States and Walker River Tribe and the Principal Defendants require additional time to confer among themselves and thereafter with each other, and are of the view that with additional time, they will be able to either resolve, or at least significantly reduce, the differences between them.

NOW, THEREFORE, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and LR IA6-1, the parties stipulate to extend the time to submit the Discovery/Motion Proposal to January 30, 2020, and respectfully request that the Court vacate the December 18, 2019, Status

1	Conference and reschedule it to a date and time which is after January 30, 2020, and which is	
2	convenient to the Court and the parties.	
3	Dated: December 12, 2019.	
4	WOODBURN AND WEDGE	U.S. DEPARTMENT OF JUSTICE
5		
6	By: / s / Gordon H. DePaoli Gordon H. DePaoli	By: / s / Andrew "Guss" Guarino (per authorization)
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12 13	Attorneys for The Schroeder Group	Attorneys for Desert Pearl Farms, Peri Family Ranch, LLC, Peri & Peri LLC, and Frade Ranches
14		Trute Runches
15	<u>ORDER</u>	
16	Dated: December 12, 2019. IT IS SO	ORDERED.
17		
18	,	
19	William G. Cobb	
20	William G. Cobb United States Magistrate Judge	
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